



**TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION
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January 21, 2015

**Wendy Braxter-Rhyne, MS4 Program Manager
City of Jackson
117 E. Main Street, Ste. 206
Jackson, Tennessee 38301**

**REF: MS4 Meeting Follow-up Letter
Permit No.: TNS075361
Madison County**

Dear Wendy,

Thank-you for setting aside time the morning of Tuesday, January 13, 2015, for my Manager, Conner Franklin and me to meet with you along with Scott Chandler, the City of Jackson's City Engineer to discuss, in general terms, the City of Jackson's MS4 program. As Conner and I explained, it is our desire to assist each of the MS4 programs under the regulatory jurisdiction of the Jackson Environmental Field Office (JEFO) as they continue to develop their programs and adapt to the continuing evolution of the MS4 Permit. We would like to see each of our MS4 Programs reach an exemplary status. We consider it an honor and a privilege to be associated with you and your municipality.

Both Conner and I understand how important it is that the MS4 Program Manager have steadfast support from the other impacted areas within the municipality such as their zoning department, plans review area, construction inspectors, code enforcement and list could go on and on. Scott's role as City Engineer is a very important part of the success of the MS4 program and his role cannot be understated. It is of vital importance. After interacting with him during our meeting there appears to be no doubt that he is knowledgeable of, and involved in, Jackson's MS4 program. It is evident that he maintains the mutual goals that define the intent of MS4 Permit Program.

The following is a list of a few highlights of our meeting:

- 1. The delay of the MS4 permit requirement for the adoption of a "permanent BMP ordinance" for one year was discussed. As noted, the option to delay implementation had officially been offered to the MS4 municipalities that morning (01.13.2015). The City of Jackson has officially made the request for the extension of time.**

2. **The City of Jackson has not, at this point in time, bid-out the required “Visual Stream Assessment” (VSA). The justification for the delay is the fact that the VSA is not in the current budget but funds would be available in next year’s budget. This is acceptable but please be reminded that it needs to be completed prior to the issuance of the new MS4 permit that is scheduled to become effective by the end of September, 2015.**
3. **The City of Jackson is in the process of up-dating their webpage. We discussed that ‘Stormwater’ was prominent on the current home page and it is desirable that it be prominent on the new home page. You are encouraged to follow-through with your desire to lobby for the home page. (Good Luck!)**
4. **Mapping was another important topic of conversation. It was encouraging to be informed that the City of Jackson has purchased some hand held GPS units and had assigned them to a few employees to locate drain inlets. As a reminder, mapping (GIS preferred) of all of your underground stormwater system will be a requirement of the 2015 MS4 permit. Bear in mind, you will probably be given the full permit cycle of 5 years to get this accomplished. The main reason for discussing this issue prior to the new permit is to give you a heads-up for budgeting purposes.**

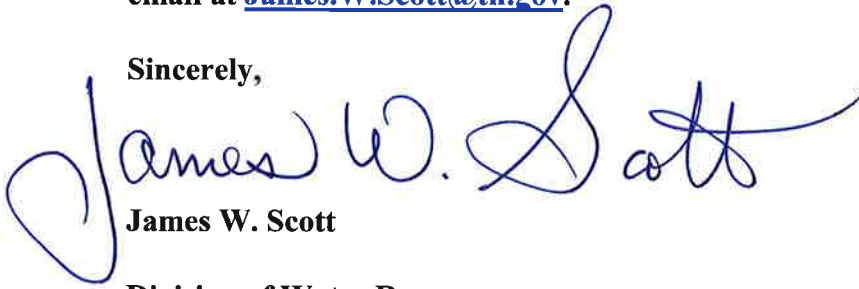
One good thing about a GIS System, once you get the GIS program operational, you can map almost every municipal system you have.

5. **The City of Jackson’s MS4 budget seemed somewhat low as compared to a system comparable in size. After your explanation, however, it appeared reasonable in light of what the money actually funded. Admittedly, the permit does not give any guidance as to what should be included in the “Annual Budget” question on the “Annual Report”.**
6. **It was noted that you do very well in the area of Public Education and Public Involvement, which are two key areas of the MS4 Permit. Your efforts in this area are greatly appreciated. Please keep up the good work and document your efforts. You deserve the credit and it looks quite good on your Annual Report and Audit.**
7. **This inspector was very pleased with the MS4 forms that you developed for “Notice of Violation” (NOV); your High Visibility “door hangers” that question who may have committed an MS4 violation when the responsible party is unknown or unconfirmed, and your “Cease and Desist Order” form. The beauty of these forms is that they allow you, your inspector or your investigator the ability to take immediate enforcement action if needed. Great job!**
8. **The EPA Scorecard was also discussed. Based our discussion and in light that the 2015 MS4 Permit will be issued in September, it seems to this inspector that submitting an EPA Scorecard at this point in time and then completing one within 12 months of September, 2015, is of no great benefit. The purpose for completing a scorecard is to document progress over the 5 year permit cycle. With this in mind, I am of the opinion to allow you to focus on the scorecard for the 2015 year and not worry about submitting the one that realistically should have been completed for the 2010 permit year.**

Again, Conner and I truly appreciated your time, but more importantly, the City of Jackson's commitment to the MS4 program. Hopefully the City of Jackson's MS4 story, when re-written in about four years, will be a story of continue victories and glowing success stories to tell.

If you have any questions concerning this letter or if I may assist in any other area of concern that you think I can assist you with, please feel free to contact by phone at 731-512-1362 or by email at James.W.Scott@tn.gov.

Sincerely,



James W. Scott

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Cc

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